

**Amendments to the Drawings**

In this paper, Applicant has added new Figures 7-10, as explained in the Remarks section. The new figures are found attached to this paper.

**REMARKS****A. Summary of Interview with the Examiner**

Applicant is grateful for the courtesy extended by the Examiner to Steven F. Meyer (Registration No. 35,613), Joseph Eng Jr. (Reg. No. 54,084), and Yoshihisa Miyazaki (representative of Toyota), who were acting as representatives for Applicant during a telephone interview with the Examiner on March 14, 2006.

During the interview, Applicant's representatives discussed proposed amendments to claims 33 and 47 and the possibility of including new drawings 7-10. Both the amendments and the drawings were submitted to the Examiner for his consideration prior to the interview.

The interview began with a review of the bottom emission structure devices as discussed at page 13, line 17 to page 14, line 20 of the specification. During the review, Applicant's representatives stressed that the bottom emission structure devices taught in this section of the specification have the property of scattering external light twice: once before reflection by the reflective electrode and once after reflection by the reflective electrode. To support this argument further, Applicant's representatives directed Examiner to Figure 5 of the application, which illustrates one embodiment of such a device.

Applicant's representatives also noted that the specification provides support for proposed new Figures 7-10, which are illustrations of bottom emission structure devices described in the text at page 13, line 17 to page 14, line 20. After reviewing this section of the specification, the Examiner agreed that there was proper support for new Figures 7-10 in the originally filed specification.

Following a review of claimed device, Applicant's representatives turned to the references that were cited by the Examiner in the Office Action dated December 22, 2006. Of the three references that were used to reject claims 33 and 47 (namely U.S. Patent No. 4,138,195 to Saurer ("Saurer"), U.S. Patent No. 6,466,368 to Piepel ("Piepel"), and U.S. Patent No. 4,580,877 to Washo ("Washo")), only Saurer and Piepel were discussed in detail.

Applicant's representatives noted that the Office Action used Saurer as a primary reference for a disclosure of a device containing an electroluminescent layer and a reflective electrode, and used Piepel for an alleged teaching of a "scattering portion". However, Applicant's representatives pointed out the following two problems with the Office Action's proposed combination:

(1) **There is no motivation to combine the references:** Whereas Saurer is directed to electroluminescent devices, Piepel is directed to macroscopic screens that are used in image projection devices, such as projection television sets. Applicant's representatives maintained that there was no motivation in either Saurer or Piepel to take Piepel's macroscopic screen and to miniaturize and to insert it within Saurer's electroluminescent device, as suggested by the December 22, 2005 Office Action. Applicant's representatives further noted that such an argument had been made previously in the Remarks section of an amendment filed on October 7, 2005. After reviewing Saurer and Piepel with Applicant's representatives, the Examiner conceded that there was no motivation to combine the references.

(2) **The proposed combination impermissibly changes the principle of operation of Piepel:** Applicant's representatives noted that Piepel's macroscopic screen is made for one-way transmission of light, as shown in Figure 1 of Piepel, for example. Applicant's representatives further noted that the asymmetric arrangement of the layers in

Piepel's screen (as shown in Figure 14, for example) is specifically designed for one way transmission of light, because incoming light must be dispersed by the glass beads first before it is scattered by a rough matte surface.

Applicant's representatives reiterated that the claimed device scatters light twice, as discussed earlier in the interview, and that Piepel does not appear to teach such double scattering. Accordingly, any attempt to incorporate the scattering screen of Piepel into Saurer as an attempt to arrive at the claimed invention would impermissibly change the principle of operation of Piepel. Upon further review of Piepel with Applicant's representatives, the Examiner agreed that Piepel did not teach the double scattering as recited in Applicant's claims. Accordingly, the Examiner conceded that it was inappropriate to combine Saurer and Piepel.

In the last part of the interview, Applicant's representatives inquired as to whether the proposed claim amendments were acceptable to the Examiner. In response, the Examiner stated that the proposed claim amendments overcame any prior art of record.

#### B. Status of the Drawings

In this paper, Applicant has added new Figures 7-10, as discussed during the interview of March 14, 2006. As the Examiner himself noted, support for these figures is found in the originally filed specification at page 13, line 17 to page 14, line 20 of the specification. The new figures are included in the Appendix at the end of this paper.

These figures are being added to make explicit what was already implicit in the specification. No new matter has been added by these new figures.

C. Status of the Specification

Applicant has amended the specification to include references to newly added Figures 7-10, as shown on pages 10-11 of this of this response.

C. Status of the Claims

Currently, claims 21-52 are pending. Of these claims, claims 21-32 and 41-46 have been withdrawn from consideration. Thus, claims 33-40 and 47-52 are under examination.

In this paper, claims 33 and 47 have been amended to have the same language as the proposed claims that were presented to the Examiner during the March 14, 2006 interview. Support for these amendments is found at page 13, line 17 to page 14, line 20 of the specification. No new matter has been added.

Claims 33-35, 38, 39, and 47-49 have been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Saurer, in view of Washo and Piepel. Claims 36 and 50 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Saurer and Washo, in view of U.S. Patent No. 6,113,801 to Savant ("Savant"). Claims 37 and 51 have been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Saurer, in view of Washo and Piepel, and in further view of U.S. Patent No. 6,480,249 to Iwata ("Iwata"). Claims 40 and 52 have been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Saurer, in view of Washo and Piepel, and in further view of U.S. Patent No. 6,195,142 to Gytoku ("Gytoku").

D. Applicant's Claims Are Patentable Over the Cited References

1. Claims 33-35, 38, 39, and 47-49 Are Patentable Over the Cited Art

Applicant respectfully traverses the rejection of claims 33-35, 38, 39, and 47-49 as allegedly being unpatentable over Saurer, in view of Washo and Piepel for at least the following reasons: (1) there is no motivation to combine these references in the manner suggested by the office action; and (2) the proposed combination impermissibly changes the principle of operation of Piepel. Accordingly, the rejection of these claims under 35 U.S.C. §103(a) should be withdrawn. MPEP §§2143.01 and 2143.02.

The Office Action attempts to arrive at Applicant's inventive devices by combining the electroluminescent device of Saurer with the screen of Piepel and the passivation film of Washo [12/22/05 Office Action, paragraph bridging pages 2-3].

However, during the interview of March 14, 2006, the Examiner agreed that (1) there was no proper motivation to combine Saurer and Piepel in the manner originally proposed by the December 22, 2005 office action; and (2) the proposed combination impermissibly changes the principle of operation of Piepel. The inclusion of Washo does not cure these problems with the proposed combination of Saurer and Piepel, as Washo is merely directed to a display panel that contains an electroluminescent layer with a pigment for reflecting radiation toward an LCD [Washo, abstract].

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection of claims 33-35, 38, 39, and 47-49.

2. Claims 36 and 50 Are Patentable Over the Cited References

Applicant respectfully traverses the rejection of claims 36 and 50 for allegedly being unpatentable over Saurer, in view of Washo, Piepel, and Savant. As established during the interview of March 14, 2006, there is no motivation to combine Saurer and Piepel, and the proposed combination of Saurer and Piepel impermissibly changes the principle of operation of Piepel. These arguments remain true, even when Washo and Savant are added as tertiary and quaternary references. Applicant does not see where in the specifications of either Washo or Savant there is any teaching that provides the motivation to combine Saurer and Piepel, or that explains that Piepel's screen can be used for double scattering.

Accordingly, the rejection of claims 36 and 50 under 35 U.S.C. §103(a) should be withdrawn. MPEP §§2143.01 and 2143.02.

3. Claims 37 and 51 Are Patentable Over the Cited References

Applicant respectfully traverses the rejection of claims 37 and 51 for allegedly being unpatentable over Saurer, in view of Washo, Piepel, and Iwata. As established during the interview of March 14, 2006, there is no motivation to combine Saurer and Piepel, and the proposed combination of Saurer and Piepel impermissibly changes the principle of operation of Piepel. These arguments remain true, even when Washo and Iwata are added as tertiary and quaternary references. Applicant does not see where in Washo or Iwata there is any teaching that provides the motivation to combine Saurer and Piepel, or that explains that Piepel's screen can be used for double scattering.

Accordingly, the rejection of claims 37 and 51 under 35 U.S.C. §103(a) should be withdrawn. MPEP §§2143.01 and 2143.02.

4. Claims 40 and 52 Are Patentable Over the Cited References

Applicant respectfully traverses the rejection of claims 40 and 52 for allegedly being unpatentable over Saurer, in view of Washo, Piepel and Gyotoku. As established during the interview of March 14, 2006, there is no motivation to combine Saurer and Piepel, and the proposed combination of Saurer and Piepel impermissibly changes the principle of operation of Piepel. These arguments remain true, even when Washo and Gyotoku are added as tertiary and quaternary references. Applicant does not see where in either Washo or Gyotoku there is any teaching that provides the motivation to combine Saurer and Piepel, or that explains that Piepel's screen can be used for double scattering.

Accordingly, the rejection of claims 37 and 51 under 35 U.S.C. §103(a) should be withdrawn. MPEP §§2143.01 and 2143.02.



**CONCLUSION**

Based on the foregoing amendments and remarks, Applicants respectfully request reconsideration and withdrawal of the rejection of claims and allowance of this application.

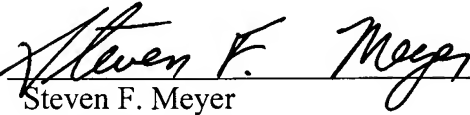
**AUTHORIZATION**

The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. **13-4500**, Order No. 5000-5109. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. **13-4500**, Order No. 5000-5109. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

Respectfully submitted,  
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Dated: March 22, 2006

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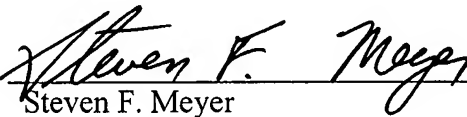
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## APPENDIX

### Figure 7-10